November 20, 2003

Mr. Lew W. Myers Chief Operating Officer FirstEnergy Nuclear Operating Company Davis-Besse Nuclear Power Station 5501 North State Route 2 Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1 - REQUEST FOR

ADDITIONAL INFORMATION RELATED TO LICENSE AMENDMENT REQUEST

(TAC NO. MC0583)

Dear Mr. Myers:

By application dated August 25, 2003, FirstEnergy Nuclear Operating Company requested a license amendment to revise the technical specifications regarding the steam and feedwater rupture control system instrumentation setpoints and surveillance intervals. Based on the staff's review of your application, please provide additional information as discussed in the enclosure to this letter.

The enclosed request was discussed with Mr. D. Wuokko, et al., of your staff on October 30, 2003. A mutually agreeable target date of February 27, 2004, for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-2296 at the earliest opportunity.

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 2 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure: Request for Additional Information

cc w/encl: See next page

November 20, 2003

Mr. Lew W. Myers Chief Operating Officer FirstEnergy Nuclear Operating Company Davis-Besse Nuclear Power Station 5501 North State Route 2 Oak Harbor, OH 43449-9760

SUBJECT: DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1 - REQUEST FOR

ADDITIONAL INFORMATION RELATED TO LICENSE AMENDMENT REQUEST

(TAC NO. MC0583)

Dear Mr. Myers:

By application dated August 25, 2003, FirstEnergy Nuclear Operating Company requested a license amendment to revise the technical specifications regarding the steam and feedwater rupture control system instrumentation setpoints and surveillance intervals. Based on the staff's review of your application, please provide additional information as discussed in the enclosure to this letter.

The enclosed request was discussed with Mr. D. Wuokko, et al., of your staff on October 30, 2003. A mutually agreeable target date of February 27, 2004, for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-2296 at the earliest opportunity.

Sincerely,

/RA/

Carl F. Lyon, Project Manager, Section 2 Project Directorate III Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket No. 50-346

Enclosure: Request for Additional Information

cc w/encl: See next page

DISTRIBUTION:

PUBLIC PDIII-2 r/f AMendiola
THarris CLyon JHopkins
OGC ACRS CLipa, RIII

ADAMS Accession No.: ML033070083 *Memo dated 10/16/03

OFFICE	PDIII-2/PM	PDIII-2/LA	EEIB/SC	PDIII-2/SC
NAME	FLyon	THarris	EMarinos*	AMendiola
DATE	11/06/03	11/05/03	10/16/03	11/20/03

Davis-Besse Nuclear Power Station, Unit 1

cc:

Mary E. O'Reilly FirstEnergy Corporation 76 South Main St. Akron, OH 44308

Manager - Regulatory Affairs
First Energy Nuclear Operating Company
Davis-Besse Nuclear Power Station
Oak Harbor, OH 43449-9760

Director
Ohio Department of Commerce
Division of Industrial Compliance
Bureau of Operations & Maintenance
6606 Tussing Road
P.O.Box 4009
Reynoldsburg, OH 43068-9009

Regional Administrator U.S. Nuclear Regulatory Commission 801 Warrenville Road Lisle, IL 60523-4351

Michael A. Schoppman Framatome ANP 1911 N. Ft. Myer Drive Rosslyn, VA 22209

Resident Inspector U.S. Nuclear Regulatory Commission 5503 North State Route 2 Oak Harbor, OH 43449-9760

Plant Manager, Randel J. Fast FirstEnergy Nuclear Operating Company Davis-Besse Nuclear Power Station 5501 North State - Route 2 Oak Harbor, OH 43449-9760

Dennis Clum
Radiological Assistance Section Supervisor
Bureau of Radiation Protection
Ohio Department of Health
P.O. Box 118
Columbus, OH 43266-0118

Carol O'Claire, Chief, Radiological Branch Ohio Emergency Management Agency 2855 West Dublin Granville Road Columbus, OH 43235-2206

Zack A. Clayton
DERR
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, OH 43266-0149

State of Ohio Public Utilities Commission 180 East Broad Street Columbus, OH 43266-0573

Attorney General
Department of Attorney
30 East Broad Street
Columbus, OH 43216

President, Board of County Commissioners of Ottawa County Port Clinton, OH 43252

President, Board of County Commissioners of Lucas County One Government Center, Suite 800 Toledo, Ohio 43604-6506

David Lochbaum, Nuclear Safety Engineer Union of Concerned Scientists 1707 H Street NW, Suite 600 Washington, DC 20006

The Honorable Dennis J. Kucinich United States House of Representatives Washington, D.C. 20515

The Honorable Dennis J. Kucinich, Member United States House of Representatives 14400 Detroit Avenue Lakewood, OH 44107

REQUEST FOR ADDITIONAL INFORMATION

RELATED TO LICENSE AMENDMENT REQUEST DATED AUGUST 25, 2003

FIRSTENERGY NUCLEAR OPERATING COMPANY

DAVIS-BESSE NUCLEAR POWER STATION, UNIT 1

DOCKET NO. 50-346

By letter dated August 25, 2003, FirstEnergy Nuclear Operating Company submitted a request to the Nuclear Regulatory Commission (NRC) to revise the Davis-Besse Nuclear Power Station, Unit 1 Technical Specifications (TS) to:

- Revise the Steam and Feedwater Rupture Control System (SFRCS) instrumentation TS to clearly identify the appropriate actions to be taken if an SFRCS instrumentation channel's output logic becomes inoperable,
- Relocate the SFRCS instrumentation trip setpoints from the TSs, and
- Decrease the channel functional test frequency from monthly to quarterly for the SFRCS instrument channels and make the associated changes to the trip setpoint allowable values.

Responses to the following request for additional information with regard to the Davis-Besse setpoint methodology and surveillance interval extension will allow the staff to complete its review in a timely manner.

Table 3.3-11, "Steam and Feedwater Rupture Control System Instrumentation"

1. The new action statement, Action 18, that is proposed in the amendment reads as follows:

"With any component in the Output Logic inoperable, either declare the associated actuated component(s) inoperable, or place the associated actuated component(s) in the SFRCS-actuated position within one hour."

Provide the technical basis for declaring the associated actuated components inoperable as this will allow more time than allowed for placing the components in the SFRCS actuated position within 1 hour.

Table 3.3-12, "Steam and Feedwater Rupture Control System Trip Setpoints"

1. In Table 3.3-12, the allowable values for Functional Unit 1 (Steam Line Pressure-Low), Functional Unit 2 (Steam Generator Level-Low), and Functional Unit 3 (Steam Generator Feedwater Differential Pressure-High) are all revised due to updated calculations and current setpoint methodology as stated in the amendment. Has the current setpoint methodology been approved by the NRC staff? If not, provide the setpoint methodology used to calculate the revised allowable values for the functional units mentioned above.

2. The amendment also states that the trip setpoints in the table are allowed to be removed since NUREG-1430 specifies only the allowable values for instrumentation functional units. To consistently reflect this specification, consider labeling the title of the table as:

"Steam and Feedwater Rupture Control System Instrumentation Allowable Values"

<u>Table 4.3-11, "Steam and Feedwater Rupture Control System Instrumentation Surveillance Requirements"</u>

1. The methodology described in Electric Power Research Institute (EPRI) TR-103335-R1 is representative of extending calibration intervals based upon instrument drift analysis. The NRC staff has not accepted the EPRI TR and has issued a status report dated December 1, 1997, which documents the staff's issues with the report. The amendment requests surveillance interval extensions for channel functional tests from monthly to quarterly for the four Functional Unit 1 instrument channels on Table 4.3-11. The staff has previously accepted surveillance test interval extension requests based on a probability analysis result for core damage frequency and large early release frequency showing significantly lower increments together with a failure mode and effect analysis. Provide the technical basis for your request based on analysis that the staff has previously accepted.